



Inertial Airline Services, Inc.

March 6, 2001

Docket management System
U.S. Department of Transportation
Room Plaza Level 401
400 7th St., SW
Washington, DC 20590-0001

SUBJECT: Docket Number FAA-2000-8460

Dear Sir or Madam:

Please accept these comments in response to the Notice of Proposed Rulemaking in regard to 14 CFR Part 39.

First of all, there is not need to remove three categories of information from in the current airworthiness directives. The current format ensures that the reader is provided with all the necessary information. There is no benefit to safety, nor need served by this proposal, in fact possibly a detriment to safety due to the lack of information.

In regard to the question and answer format proposed for Part 39 of Title 14, the format fails to meet the needs of the industry, nor the responsibility of the government for the following reasons:

1. Questions and answers do not provide for the communication of a clear and concise standard. It leaves one with the impression that the standard is located somewhere else. There would be no straightforward standard.
2. The format is better used for interpretation of the standard, not the communication of the standard.
3. It provides answers only for those questions that have been asked and fails to answer those questions that remain unasked in the regulation.
4. Topic statements are easier to read and to search for the desired information.

The plain language format leaves ambiguity with the use of personal pronouns.

1. Using 'you' when directing responsibility for an action is incorrect, as the person reading the regulation may not be the responsible party. Specific reference to responsible parties is critical.

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2. The use of 'we' instead of 'FAA' also can be confusing.
3. Reference to the FAA is inconsistent, sometimes naming the agency and sometimes using the pronoun 'we.'

The flat statement that an airworthiness directive applies to a product even if the product has been modified is not 100% true in all cases. There are numerous cases where an airworthiness directive applies only to a modified product, and other cases where it applies unless the product has already been altered. These are so stated in the text of the AD.

Proposed Section 39.19 states,

Where can I get information about any other means of complying approved by FAA?

The office identified in an airworthiness directive as responsible for approving alternative means of complying can provide information about the existence of any alternatives FAA already has approved.

Does this mean that these alternatives become public information upon approval? Has the FAA decided whether this information will be treated as proprietary information? It appears that the FAA is pledging to make proprietary information publicly available, which could be a violation of criminal law (18 USC 1905).

We recommend that the FAA abandon this rulemaking project on the grounds that it does not affect safety and the change does not benefit aviation safety nor the interest of the United States in any way. It appears to be change for the sake of change only.

Respectfully Submitted,

Blaine R. Lewis
Director of Quality